

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

Amy Kempczynski

Chapter: 13,

BANKRUPTCY NO: 18-16269-ELF

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*Order Denying Motion of State Financial Network  
For Modification of Stay*

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AND NOW, this                      day of                      2,020 upon consideration of the  
Debtor's Answer and a Hearing,

IT IS HEREBY ORDERED

That The Motion of State Financial Network for Modification of Automatic  
Stay Is Denied.

SO ORDERED

BY THE COURT

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U.S. BANKRUPTCY JUDGE

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

Amy Kempczynski

Chapter: 13,

BANKRUPTCY NO: 18-16269-ELF

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**Debtor's Answer to the Motion of  
State Financial Network for Relief from Automatic Stay**

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Debtor, by his attorney, Allan K. Marshall, Esq., answers the Motion of State Financial Network:

1. Admitted.
2. Admitted.
3. This para states a conclusion of law to which no response is required. Debtor demands strict proof of all the factual averments of this para.
4. Admitted.
5. Admitted.
6. This para states a conclusion of law to which no response is required.
7. This para states a conclusion of law to which no response is required. If true and if proven, Debtor willing to cure the missing amount.
8. This para states a conclusion of law to which no response is required.
9. This para states a conclusion of law to which no response is required. If true and if proven, Debtor willing to cure the missing amount.
10. This para states a conclusion of law to which no response is required. If true

and if proven, Debtor willing to cure the missing amount.

11. This para sates a conclusion of law to which no response is required. If true and if proven, Debtor willing to cure the missing amount.
12. WHEREFORE, Debtor demands a hearing.

FIRST DEFENSE  
*SUFFICIENT EQUITY*

13. Debtor has equity, protect the interest of State Financial Network.

SECOND DEFENSE  
Less Drastic Remedy

14. Even if the moving party is entitled to the Relief from the Stay, the Stay should not be terminated. The Court should rather grant less drastic Relief by conditioning or modifying the Stay.
15. WHEREFORE, the Debtor requests this Honorable Court to deny the Motion for Modification of the Stay and for such other Relief as the Court deems just and proper.

Respectfully Submitted,

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/s/  
Allan K. Marshall, Esq.  
Attorney for Debtor

September 23, 2020